

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

**RONDA RACCA, Individually and
on behalf of all similarly situated
persons,**

Plaintiffs,

vs.

Case No. _____

**EFG GENERAL PARTNER CORP.;
EDUCATION FUTURES
MANAGEMENT, COMPANY;
EDUCATION FUTURES GROUP, LLC
COMPUTER CAREER CENTER, L.P.
d/b/a VISTA COLLEGE; PROSPECT
PARTNERS, LLC; JIM TOLBERT;
MICHAEL McINERNEY and LOUIS
KENTER,**

Defendants.

**DECLARATION OF MICHAEL MCINERNEY IN SUPPORT OF NOTICE OF
REMOVAL**

I, Michael McInerney, declare:

1. My name is Michael McInerney. I am named as one of the Defendants in the above-styled action. I am over 21 years old and have personal knowledge of the information in this Declaration in my capacity as Vice President at Prospect Partners, LLC, based on my review of company records and my investigation into the matters addressed herein. If called to testify, I would and could competently testify to the facts in this Declaration.

2. I am currently employed by Prospect Partners, LLC as Vice President. I have been employed in this role since September 2015. My duties at the company include investing in and advising niche manufacturing, value-add distribution, specialty service and other fast-growing

companies, and managing select portfolio company relationships and sourcing and executing transactions.

3. Prospect Partners, LLC is a limited liability company organized under the laws of the State of Delaware. Until recently, Prospect Partners, LLC's headquarters was located at 200 West Madison Street, Suite 2710, Chicago, IL 60606. Prospect Partners, LLC is currently in the process of opening a new office, which will serve as its headquarters, located at 227 West Monroe Street, Suite 3550, Chicago, IL 60606.

4. I currently reside full time at 1137 North Wood Street in Chicago, Illinois 60622. I currently have no plans to move my permanent residence from Illinois.

I declare under penalty of perjury under the laws of the States of Texas and Illinois, and the laws of the United States of America, that the foregoing is true and correct.

Dated: March 16, 2022

By: 
Michael McInerney